

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
WILLIAM R. GALLAGHER, : CHAPTER 13  
: CASE NO. 5-16-00276  
Debtor(s) :  
: : : : : : : : : : : :  
: : : : : : : : : : : :  
CHARLES J. DEHART, III :  
Movant(s) :  
vs. :  
: :  
WILLIAM R. GALLAGHER, :  
Respondent(s) :  
.....

**OBJECTION TO TRUSTEE'S MOTION TO DISMISS CASE**

**AND NOW COMES**, WILLIAM R. GALLAGHER, Debtor, by and through his attorney, Kimberly D. Martin, and files this Objection as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. By way of further answer, Debtor is in the process of compiling information necessary for amending his plan. Debtor does not want his bankruptcy case dismissed. Debtor will file an amended plan prior to September 13, 2016.

**WHEREFORE**, WILLIAM R. GALLAGHER, Debtor, respectfully requests your Honorable Court to not dismiss the case.

Dated: 9/8/2016

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Kimberly D. Martin, Esquire  
1022 Court Street  
Honesdale, PA 18431  
(570) 253-6899  
Attorney for Debtor  
kmartin@martin-law.net